



Federal Aviation Administration

Memorandum

Date: February 28, 2022

To: Kenyetta Spencer Mills, Program Analyst, AFB-470

From: David W. Cox, Will Rogers FSDO 15, General Aviation Division G, AFG-700

Prepared by: Laurence J Schreiber., Aviation Safety Inspector, 405-951-4243

Subject: Aviation Safety Hotline Complaint S20210819002

DAVID W COX Dg by signed by DAVID W COX

Date 2022-03-01 12:36:15 0600

A Brief Synopsis:

This memorandum is in response to Federal Aviation Safety Hotline Complaint S20210819002, dated August 19, 2021. The investigation was conducted by the Will Rogers Flight Standards District Office (WRS-FSDO).

The complainant alleges that on or about August 6, 2021, a King Air model 200 with registration number N970KR, serial number BB-454, was maintained and approved for return to service by KSNL AERO LLC, a Title 14 Code of Federal Regulations (14 CFR) Part 145 certificated repair station, designator 8KLR, when N970KR was not in an airworthy condition.

A Brief Narrative of the Investigation:

On August 12, 2021, Mission Air Support, the registered owner of N970KR, moved that aircraft from KSNL AERO LLC located at the Shawnee Regional Airport in Shawnee, OK to an alternate 14 CFR Part 145 repair station by the name of Red Cloud Aviation, also located at that same airport. After moving N970KR, an independent review and inspection of that aircraft and its maintenance records was accomplished. On August 14, 2021, Red Cloud Aviation provided an initial inspection report to Mission Air Support which indicated numerous airworthiness safety concerns and deficiencies and is included in this report.

Contact with the Complainant:

On November 18, 2021, personnel from the WRS-FSDO called the complainant, Colon Miller, regarding Hotline Complaint S20210819002. During that call, Mr. Miller was provided an opportunity to speak about the claims in the Hotline Complaint and he verified the claims were as stated within that complaint. Mr. Miller was asked if there was any additional information he would like to add and he

EXHIBIT

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conveyed that he would notify the WRS-FSDO if any additional claims need to be included for items further discovered by Red Cloud Aviation. Mr. Miller also noted that N970KR, subject documentation, and evidence to substantiate the claims is currently held at Red Cloud Aviation. Mr. Miller was informed that the WRS-FSDO would make the necessary arrangements with Scott Lee of Red Cloud Aviation to have access to inspect N970KR and its maintenance records and other supporting documents.

On November 23, 2021, personnel from the WRS-FSDO visited with (b) (6), Scott Lee, of Red Cloud Aviation. Mr. Lee provided access to N970KR and the available maintenance records for review. The maintenance records for N970KR were provided and copies were made. Included in those copies was a maintenance entry for Work Order #28, dated August 6, 2021, (b) (6) contained an approval for return to service by KSNL AERO LLC.

On December 1, 2021, personnel from the WRS-FSDO called (b) (6), Darrin Lofton, of KSNL AERO LLC, to inform (b) (6) that personnel from (b) (6) office will be conducting an onsite visit to perform a limited inspection of Work Order #28 for N970KR and any supporting documentation. Mr. Lofton (b) (6) (b) (6) would be able to provide anything necessary for the inspection.

On December 7, 2021 through January 6, 2022 personnel from the WRS-FSDO made multiple visits to KSNL AERO LLC to obtain additional information and copies of documents with regards Work Order #28 to include training documentation.

Description of Findings:

- 1) Complaint – “Service Bulletin status is in question since we do not have them to verify completion of the applicable bulletins to a Part 135 operation.”

Finding – The Service Bulletin status is an owner/operator responsibility. There is no finding that indicates KSNL AERO LLC kept any documentation from the owner for Service Bulletin status. Quality of reports purchased are not regulated by 14 CFR Parts 43, 91, or 145 and are a civil matter.

- 2) Complaint – “Primary logs are adequate regarding airframe, engine and propeller for a viewing by a potential customer, however there are some AD list inconsistencies with reference to recurring AD’s and life limited parts that are referenced as “almost” and “over” which give vague indications.”

Finding – Investigation of this complaint found some inconsistencies between AD reports dated June 10, 2021 and August 10, 2021. (b) (6) reports are signed by KSNL AERO LLC personnel. (b) (6) claim is substantiated in the fact that (b) (6) reports were provided by KSNL AERO LLC and (b) (6) do not contain the same information as required by 14 CFR Section 91.417(a)(2)(v).

- a) Differences:
 - i) AD 78-20-12 is not listed on AD record dated August 6, 2021 or record dated June 10, 2021.
 - ii) AD 78-20-02 is listed on AD record dated August 6, 2021 and is for a McDonnell Douglas DC-10 (b) (6) the subject matches the description for AD 78-20-12.
 - iii) AD 96-15-04 is not listed on AD record dated August 10, 2021 (b) (6) it is listed on AD record dated June 10, 2021.

- iv) AD 2004-23-02 indicates as Rev 2 on AD compliance record dated August 10, 2021. AD 2004-23-02 has not been revised. AD 04-23-02 is record on AD record dated June 10, 2021.
- b) The aircraft logbook release entry dated August 6, 2021 from KSNL AERO LLC line item 3 states that the AD were researched and developed a complete list of all terminated and recurring ADs for the airframe engine, propellers and avionics and copy provided to the customer.
- 3) Complaint – “The biggest concern is the life limited parts list which is required by 135 and has been found to be deficient in that the list states many items to have been changed, however the logs do not support that. The biggest to jump out at us is the landing gear. It is shown on the new list to have been changed 22 Aug 2019 at 10,308 cycles, however when you reference the past log book entry matching that date by Primary Flight Maintenance, it states the NSLG, LHLG and RHLG Assemblies to include each drag brace was only inspected and lubricated, not removed and overhauled or exchanged. Upon further research it was found that on 1 Sep 2017 the nose and main gear decals were replaced with new by Trim Aire Aviation which alludes to why there are no serial numbers or data of any kind on the gear strut assemblies. These facts clearly show the life limited component list is incorrect and would be grounds for immediate 135 grounding. Corrective action would be compiling a new life limit component list with the logs available.”

Finding – This claim is substantiated as the landing gear was found to have numerous discrepancies. (b) (6), that the landing gear was removed due to wear and tear discrepancies as well as data placards that were blank. During a records review of the aircraft logs, it was found that there were some inspections accomplished, (b) (6) not all inspections were documented. The major inspections that KSNL AERO LLC referred to as being completed on August 25, 2019, was only a few hundred hours of time prior to the multiple phase inspections completed on August 6, 2021 on Work Order #28. To support the condition of the landing gear, it was removed and sent to Trace Aviation and (b) (6) incoming inspection documents the poor condition of the landing gear.

- 4) Complaint – “Nose strut is leaking and showing fluid residue running down the strut shaft.”

Finding – This claim is substantiated by photos provided by the complainant as well as the incoming inspection report from Trace Aviation indicating that there was damage to not only the seals, (b) (6) the sealing surfaces in the way of corrosion.

- 5) Complaint – “Nose wheel well as well as nose gear grimy and uncleared, old grease evident throughout.”

Finding – This claim is substantiated by photos provided from the complainant. There are also photos of the condition of the landing gear, as removed, from a previous complaint investigation. The landing gear alone was shown to not be clean enough for a thorough inspection.

- 6) Complaint – “Nose gear wheel bearings show dirt in grease and no indication of servicing.”

Finding – This claim is substantiated with photos provided from the complainant. In support of this substantiation, the condition of the landing gear is verified as less than serviceable according to the Trace Aviation incoming report.

7) Complaint – “A/C service ports not capped and showing oil in the fittings.”

Finding – This claim is substantiated as the A/C service ports should always be capped to prevent leakage of the system if a ‘schradar’ valve happens to leak. Installing caps on the service ports is standard practice. This claim is substantiated as must have been inspected as per the following:

- a) Phase 2 check list, table 609, item 23
- b) Phase 3 check list, table 603, item 11
- c) Phase 4 check list, table 609, item 23

8) Complaint – “Nose gear assembly has no serial number data affixed.”

Finding – This claim is substantiated and verified by photographic evidence as seen during a previous complaint investigation.

- a) All phase inspections, 1, 2, 3, and 4 contain the requirement to inspect the placards are in place and legible.

9) Complaint – “Main gear assemblies have no serial number data affixed.”

Finding – This claim is substantiated and verified by photographic evidence as seen during a previous complaint investigation.

- a) All phase inspections, 1, 2, 3, and 4 contain the requirement to inspect the placards are in place and legible.

10) Complaint – “Brake assemblies are dirty no indication of servicing, but function correctly.”

Finding – This claim is not supported due to lack of evidence provided from the complainant.

11) Complaint – “Screws missing and screws loose in main gear wheel wells.”

Finding – This claim is substantiated by photos provided from the complainant.

12) Complaint – “Left engine accessory gearbox vent tube axel clamp metal chaffing on tube, no rubber sleeve.”

Finding – This claim is substantiated by photos provided from the complainant.

13) Complaint – “Left engine control cannon plugs on left and right side of engine not safety wired for security.”

Finding – Engine control cannon plugs that are not self-securing are required to be safe tied as a standard industry practice. This item is substantiated by mechanic testimony and photos provided by the complainant.

14) Complaint – “Left engine fuel pressure transducer loose in adel clamp.”

Finding – This claim is substantiated by photos provided from the complainant.

15) Complaint – “Right engine starter/generator cooling duct installed incorrectly.”

Finding – This claim is substantiated by photos provided by the complainant and Red Cloud Aviation.

- a) (b) (6) substantiating this claim, personnel from the WRS-FSDO-SW15 performed a limited inspection of N970KR documenting the incorrect installation of the cooling duct.
- b) Aggravating issues are as noted.
 - i) Note phase 1 through 4 inspection/check documented by KSNL AERO LLC dated 06/14/2021 at 10163.8 hours using the Beechcraft 200 series AMM (rev E1), had several opportunities to inspect for the security and attachments of all components.
 - (1) Phase 1 check list table 612 line item 3.
 - (2) Phase 2 check list table 609 line item 27
 - (3) Phase 3 check list table 612 line item 3.
 - (4) Phase 4 check list table 609 line item 18 and 27
 - ii) KSNL maintenance release logbook entry dated August 6, 2021 line item 30 indicates the removal and installation of the RH starter generator, which would include removal and re-installation of the cooling duct for it.

16) Complaint – “Right engine control cannon plugs on left and right side of engine not safety wired for security.”

Finding – Engine control cannon plugs that are not self-securing are required to be safe tied as a standard industry practice. Substantiated by mechanic testimony.

17) Complaint – “Flap tracks and rollers dry and not lubricated for extended period.”

Finding – This claim is substantiated by photos provided from the complainant.

18) Complaint – “Engine bay drain hoses not connected, hoses old and brittle.”

Finding – This claim is substantiated by photos provided by the complainant.

19) Complaint – “Left de-ice boot repaired in two places with Pro-seal, which is normally for fuel tanks.”

Finding – This claim is substantiated by physical inspection by personnel from the WRS-FSDO. There appears to be repairs made from an elastic sealing compound that appears to be a type of fuel tank sealant, but could not be verified. However, the only repairs allowed to this type of de-ice boots are patches as called out in the manufacturer’s maintenance instructions.

20) Complaint – “Left deice boot anti chafe tape peeling off leading edge.”

Finding – This claim is substantiated by photos provided by the complainant and also shows that the chafe tape was installed in manner that would affect the airworthiness of the aircraft as it was peeling loose, which could cause disrupted airflow over the wing affecting lift.

- a) KSNL AERO LLC's log book entry dated August 6, 2021, line item 29, indicates (b)(6) replaced missing chafe tape with new chafe tape. The part number used is not indicated in the affiliated illustrated parts catalog.
- b) There is a conflicting claim for the location. The chafe tape was observed on the wing section inboard of the nacelle that does not have deice boots during a limited inspection by personnel from the WRS-FSDO.
- c) The method of installing a protective film or tape commonly noted as chafe tape by industry users is not indicated in the affiliated AMM as needing to be installed in the claimed location.

21) Complaint – “Left outer wing inspection light lens on nacelle melted.”

Finding – This claim is substantiated by photos from the complainant.

- a) As an aggravating circumstance to this claim, this item was to be inspected during the Phase 1 inspection under the check list, table 611, line item 57.

22) Complaint – “Right wing tip Nav/Strobe light lens melted and deformed.”

Finding – Navigation and Strobe light lenses have certification requirements and when a lens becomes deteriorated to the point of being deformed and melted, the integrity of the system, which is required by rule to have a specified intensity can become compromised.

- a) As an aggravation circumstance to the claim, this item was to be inspected during the Phase 1 inspection, check list, table 606, line item 3.

23) Complaint – “Corrosion on multiple places to include under copilot window and wheel wells painted over.”

Finding – This claim is substantiated by photos provided by the complainant.

- a) (b)(6) substantiating this claim, personnel from the WRS-FSDO performed a limited inspection of N970KR and witnessed corrosion as the claim states.
- b) As an aggravation circumstance to the claim, this item was to be inspected during the Phase 3 check list, table 603, line item 9 indicates inspection of the flight compartments skin to include inspection for corrosion.

24) Complaint – “Nose gear doors have large areas of paint missing on outer skin.”

Finding – This claim is substantiated, (b)(6) this is not considered as an un-airworthy item.

25) Complaint – “Rudder lower hinge cove skin left side deformed from suspected over swing, nose wheel well extension indicator verified no excess movement by towing, needs rudder horn and associated hardware checked for condition.”

Finding – This claim is unsubstantiated.

26) Complaint – “Right engine oil pressure indicates below the green arc in all power settings.”

Finding – This claim is substantiated by photos provided by the complainant.

- a) (b) (6) aggravating this complaint, the KSNL AERO LLC maintenance logbook entry dated August 6, 2021, line item 93, indicates that post inspection engine runs and aircraft operational checks IAW P&W MM and Beechcraft B200 MM, inspection/operation checks good.

27) Complaint – “Oil temperatures are high at idle and at power with an ambient temp of 85 degrees.”

Finding – This claim is unsubstantiated.

28) Complaint – “Propeller control levers are a full knob width out of line with each other, right is aft.”

Finding – This claim is substantiated by photos provided by the complainant.

- a) (b) (6) aggravating this complaint, the KSNL AERO LLC logbook entry dated August 6, 2021, line item 93, documents post inspection engine runs and aircraft operational checks IAW P&W MM and Beechcraft B200 MM, inspection/operation checks good.

29) Complaint – “Right engine is slow to spool when increasing power lever compared to left engine.”

Finding – This claim is unsubstantiated as there is no reference to the time limits for engine spooling.

30) Complaint – “Right engine power lever must be $\frac{3}{4}$ to 1 knob width further advanced than the left engine power lever to match engine power settings.”

Finding – This claim is substantiated with a video provided by the complainant. This video is available on request and is not included in the attachment.

- a) (b) (6) aggravating this complaint, the KSNL AERO LLC logbook entry dated August 6, 2021, line item 93, indicates that post inspection engine runs and aircraft operational checks IAW P&W MM and Beechcraft B200 MM, inspection/operation checks good.

31) Complaint – “During rudder boost prop governor test the required speed for propeller is 1830-1910rpm, the left engine will only get to 1780rpm, and the right engine to 1820rpm, precluding completion of the test or verification of correct operation, don’t feel as though the rudder boost was functioning, however, without making propeller speed that is an unknown.”

Finding – This claim is substantiated with a video provided by the complainant. This video is available on request and is not included in the attachment. During the video, runs were completed and rudder boost would not activate.

- a) (b) (6) aggravating this complaint, the KSNL AERO LLC logbook entry dated 08/06/2021, line item 93, indicates that post inspection engine runs and aircraft operational checks IAW P&W MM and Beechcraft B200 MM, inspection/operation checks good.

32) Complaint – “Cabin pressurization test is very slow to react, suggest troubleshooting to determine if it is an outflow valve or bleed air problem or just the controller or a leaky cabin.”

Finding – This claim is unsubstantiated.

33) Complaint – “Garmin fuel flow indication were not updating on the screens to show actual fuel quantity.”

Finding – This claim is unsubstantiated.

34) Complaint – “A/C seems to have an initial cool moment but fails to continue to cool after a few seconds, needs troubleshooting and service.”

Finding – This claim is only supported by mechanic testimony from the complainant.

During the course of the investigation the following (b) (6) items were discovered:

1. During a visit at KSNL AERO LLC on, December 1, 2021, it was discovered that KSNL AERO LLC uses a maintenance recordkeeping program noted as Quantum-mx (quantum). It is noted that Quantum is where the KSNL AERO LLC creates work orders and tracks discrepancies. This is contrary KSNL AERO LLC’s repair station manual system, RSQCM revision 2, dated March 25, 2021. At the time of this investigation, KSNL AERO LLC has not been authorized on Operations Specifications paragraph A025 – Electronic/Digital Recordkeeping System, Electronic/Digital Signature, and Electronic Media.
2. KSNL AERO LLC’s work order for N970KR is noted as Work Order #28. The numbering system derived by Quantum is not as stated by KSNL AERO LLC’s RSQCM rev 2 dated March 25, 2021, chapter 2 section 1 paragraph 1.2.9 line item 6.
3. The approval for return to service entry, dated August 6, 2021, in the Airframe logbook does not meet Title 14 CFR 43.9(a)(3) for line item 59. It does not indicate the name of the person or the certificated entity performing the NDT supplying the return to service or inspection results for the NDT inspection.
4. Line item 59 of the logbook entry for N970KR, noted in item 3 above, has the following (b) (6) issues:
 - a. The use of a Beechcraft Structural Inspection Repair Manual CH 57-17-02, 201 is not valid for the N970KR Serial Number B454.
 - b. There is a statement “Reinstalled bolts and Torqued bolts calculating for extensions IAW AC43.13-1B Change 1 Table 7-2, IAW the Beechcraft B200 SIRM P/N 98-39006 Rev. D2 ATA 57-17-01 Table 202.”
 - a. Issue 1 – Table 7-2 in AC 43.13-1B is for Minimum prevailing torque values for reused self-locking nuts.
 - b. Issue 2 – The preamble for AC 43.13-1B states the following: “This advisory circular (AC) contains methods, techniques, and practices acceptable to the Administrator for the inspection and repair of non-pressurized areas of civil aircraft, *only when there are no manufacturer repair or maintenance instructions.*” The use of the AC is in

- contradiction for Textron Aviation has published manufacturer repair and maintenance instructions.
- c. Line item 59 indicates a repair was made per a Textron service support instructions and inspection and repair manual 57-17-01, 02.
 - a. Personnel from [§ 11(b)] office called and emailed Textron aviation structures team and turbo prop technical support was contacted with regards to Textron service support instructions for the subject aircraft N970KR, Serial Number BB454 a response was received from Textron by email on January 11, 2022. The email indicated that Textron never received any issue related to that aircraft.
 - d. Inspection and repair manual 57-17-01, 02 does not indicate instructions for removing minor damage at bolt face area.
 - 5. Line item 1 indicates that KSNL AERO LLC performed work away from station and documented maintenance for a special flight permit the log book entry is dated August 6, 2021. The [§ 11(b)] inspection does not indicate that the aircraft was determined for safe flight and the entry is posted after the expiration of the SFP. The SFP for the subject aircraft was issued by the SW09 FSDO on May 6, 2021 with the expiration of May 14, 2021.
 - 6. Airframe logbook entry dated August 6, 2021 does not meet Title 14 CFR 43.11(a)(2) The date of the inspection and aircraft total time in service. The airframe logbook entry does not indicate the total time in service.
 - a. It is noted in KSNL FAA accepted RSQCM rev 2 dated March 25, 2021 chapter 2 section 1, paragraph 1.2.4 line item 3 each inspection required by the work order package has been satisfactorily completed and recorded on the applicable document in accordance with 14 CFR 43.9 and 14 CFR 43.11.
 - b. The above findings for the logbook is noted to be a deviation from the FAA accepted RSQCM and Title 14 CFR 43.11.

Outcome of the Investigation:

Upon investigation of this matter, this office determined that there are several items within this complaint as substantiated.

There are indications of deviation to, or non-compliance with, the minimum requirements of 14 CFR Part 145.

Conclusion:

Based on the review of allegations in this Hotline Complaint, this office concluded the findings that are substantiated throughout, indicates a negligent behavior of KSNL AERO LLC and it is recommended that the Principle Inspectors assigned to KSNL AERO LLC, [§ 11(b)] have been notified of these findings, initiate compliance and/or enforcement action with regards to the substantiated findings aggravating these circumstances.

The SAS documents for this complaint are; Task ID T-SW15-FY22-0669 and DCT ID: 8KLR-FY22Q2-DOR-0005. No further actions are required for this complaint. This office considers this complaint closed.

STATE OF OKLAHOMA)
)
 ss.
COUNTY OF POTTAWATOMIE)

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Filed for Record in
POTTAWATOMIE OKLAHOMA
RAESHEL FLEWALLEN, COUNTY CLERK
08-09-2021 At 02:46 PM.
LIEN 22.00
Instrument PG 1 OF 2
202100010973

PERSONAL PROPERTY LIEN STATEMENT

KSNL Aero, LLC ("KSNL"), whose mailing address is 2202 Airport Drive, Hangar 11, Shawnee, OK 74804, hereby claims a lien, pursuant to Okla. Stat. tit. 42, §§ 91 et seq. for storage, rental space, material, labor, or skill for the protection, improvement, safekeeping, towing, right to occupy space, storage or carriage thereof and for labor, money, material, or supplies for the production of, alteration, or repair of the following personal property:

<u>Manufacturer</u>	<u>Model Number</u>	<u>Serial Number</u>	<u>Registration Number</u>
BEECH	200	BB-454	N970KR

The amount of labor, money, material, or supplies furnished for the production, alteration, or repair of said personal property was \$86,299.87. The storage, space, labor, money, material, skill, or supplies were furnished for Mission Air Support Inc. ("MASI"), whose mailing address is 1260 Trapper Circle, Roanoke, VA 24012 and is the legal owner of the above aircraft. The persons furnishing the labor, money, material, or supplies were personnel of KSNL, and such labor, money, material, skill, or supplies were furnished and completed on June 15, 2021. The labor, money, material, or supplies were furnished for MASI at the direction of Gary Bannister or his agent, Thomas Fields, with respect to the above referenced aircraft (the "Aircraft Work"). In connection with the Aircraft Work, KSNL has maintained and continues to maintain uninterrupted possession of the property located at 2202 Airport Drive, Hangar 11, Shawnee, OK 74804.

DATED this 15 day of July, 2021.

KSNL AERO, LLC

By: Darrin K. Lofton
Name: Darrin K. Lofton
Title: President and Manager



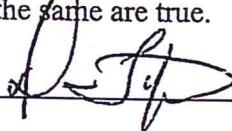
Return to:
Crowe & Dunlevy, P.C.
Attn: Jack Burns
324 N. Robinson, Ave., Suite 100
Oklahoma City, OK 73102

CLAIMANT'S AFFIDAVIT

Instrument
202100010973 PG 2 OF 2

STATE OF OKLAHOMA)
)
) ss.
COUNTY OF POTAWATOMIE)

Darrin K. Lofton, of lawful age, being first duly sworn, upon oath states that I am the President and Manager of KSNL Aero, LLC; that I have read the foregoing lien statement; that I am familiar with the matters set forth therein; and that the same are true.



Subscribed and sworn to before me this 15 day of July, 2021, by
Raegeen Mazzza.

Raegeen Mazzza
Notary Public

My Commission No.: 190019108
My Commission Expires: 02/25/2023
(SEAL)



STATE OF OKLAHOMA)
) ss.
COUNTY OF POTTAWATOMIE)

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RAESHEL FLEWALLEN, COUNTY CLERK
08-09-2021 At 02:46 PM
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Instrument 202100010974 PG 1 OF 2

PERSONAL PROPERTY LIEN STATEMENT

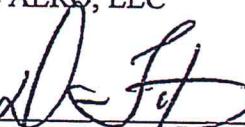
KSNL Aero, LLC ("KSNL"), whose mailing address is 2202 Airport Drive, Hangar 11, Shawnee, OK 74804, hereby claims a lien, pursuant to Okla. Stat. tit. 42, §§ 91 et seq. for storage, rental space, material, labor, or skill for the protection, improvement, safekeeping, towing, right to occupy space, storage or carriage thereof and for labor, money, material, or supplies for the production of, alteration, or repair of the following personal property:

<u>Manufacturer</u>	<u>Model Number</u>	<u>Serial Number</u>	<u>Registration Number</u>
BEECH	200	BB-456	N32TP

The amount of labor, money, material, or supplies furnished for the production, alteration, or repair of said personal property was \$51,542.35. The storage, space, labor, money, material, skill, or supplies were furnished for Mission Air Support Inc. ("MASI"), whose mailing address is 1260 Trapper Circle, Roanoke, VA 24012 and is the legal owner of the above aircraft. The persons furnishing the labor, money, material, or supplies were personnel of KSNL, and such labor, money, material, skill, or supplies were furnished and completed on June 25, 2021. The labor, money, material, or supplies were furnished for MASI at the direction of Gary Bannister or his agent, Thomas Fields, with respect to the above referenced aircraft (the "Aircraft Work"). In connection with the Aircraft Work, KSNL has maintained and continues to maintain uninterrupted possession of the property located at 2202 Airport Drive, Hangar 11, Shawnee, OK 74804.

DATED this 15 day of July, 2021.

KSNL AERO, LLC

By: 
Name: Darrin K. Lofton
Title: President and Manager



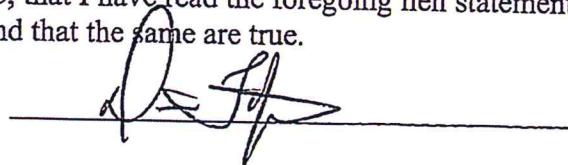
Return to:
Crowe & Dunlevy, A.C.
Attn: Tom Burns
324 N. Robinson Ave., Suite 100
Oklahoma City, OK 73102

CLAIMANT'S AFFIDAVIT

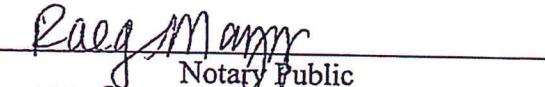
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202100010974 PG 2 OF 2

STATE OF OKLAHOMA)
)
COUNTY OF POTAWATOMIE) ss.

Darrin K. Lofton, of lawful age, being first duly sworn, upon oath states that I am the President and Manager of KSNL Aero, LLC; that I have read the foregoing lien statement; that I am familiar with the matters set forth therein; and that the same are true.



Subscribed and sworn to before me this 15 day of July, 2021, by
Raegeen Mazza.



Raegeen Mazza
Notary Public

My Commission No.: 19001908
My Commission Expires: 02/25/2023
(SEAL)

